



8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 January 2023 Grand Jury

11 UNITED STATES OF AMERICA,

CR No. 2:23-cr-00566-FMO

12 Plaintiff,

I N D I C T M E N T

13 v.

14 CELIA JANE LETENDER QUINN,  
15 aka "Jane Quinn,"  
aka "Jane Letender,"  
[18 U.S.C. § 641: Theft of  
Government Property in Excess of  
\$1,000; 18 U.S.C. § 981(a)(1)(C)  
and 28 U.S.C. § 2461(c): Criminal  
Forfeiture]

16 Defendant.

17 The Grand Jury charges:

18 COUNTS ONE THROUGH FIFTEEN

19 [18 U.S.C. § 641]

20 On or about the dates set forth below, in Los Angeles County,  
21 within the Central District of California, defendant CELIA JANE  
22 LETENDER QUINN, also known as ("aka") "Jane Quinn," aka "Jane  
23 Letender," knowingly and willfully stole, purloined, and converted to  
24 her own use property of the United States Social Security  
25 Administration (the "SSA"), a department and agency of the United  
26 States, having a value in the aggregate in excess of \$1,000, namely,  
27 Retirement Insurance Benefits in the following amounts, to which she

1 knew that she was not entitled, with the intent to deprive the SSA of  
 2 the use and benefit of that money:

COUNT	DATE	AMOUNT
ONE	12/03/2018	\$1,731
TWO	01/03/2019	\$1,782
THREE	02/01/2019	\$1,782
FOUR	03/01/2019	\$1,782
FIVE	04/03/2019	\$1,782
SIX	05/03/2019	\$1,782
SEVEN	06/03/2019	\$1,782
EIGHT	07/03/2019	\$1,782
NINE	08/02/2019	\$1,782
TEN	09/03/2019	\$1,782
ELEVEN	10/03/2019	\$1,782
TWELVE	11/01/2019	\$1,782
THIRTEEN	12/03/2019	\$1,782
FOURTEEN	01/03/2020	\$1,803
FIFTEEN	02/03/2020	\$1,803

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of the defendant's conviction of  
8 the offenses set forth in any of Counts One through Fifteen of this  
9 Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United  
11 States of America the following:

12 (a) All right, title and interest in any and all property,  
13 real or personal, constituting, or derived from, any proceeds  
14 traceable to any such offense; and

15 (b) To the extent such property is not available for  
16 forfeiture, a sum of money equal to the total value of the property  
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),  
19 as incorporated by Title 28, United States Code, Section 2461(c), the  
20 defendant, if so convicted, shall forfeit substitute property, up to  
21 the total value of the property described in the preceding paragraph  
22 if, as the result of any act or omission of the defendant, the  
23 property described in the preceding paragraph, or any portion  
24 thereof: (a) cannot be located upon the exercise of due diligence;  
25 (b) has been transferred, sold to or deposited with a third party;  
26 (c) has been placed beyond the jurisdiction of the court; (d) has

1 been substantially diminished in value; or (e) has been commingled  
2 with other property that cannot be divided without difficulty.

3 A TRUE BILL  
4

5 /S/  
6 Foreperson

7 E. MARTIN ESTRADA  
8 United States Attorney

9 MACK E. JENKINS  
10 Assistant United States Attorney  
Chief, Criminal Division

11   
12 SCOTT M. GARRINGER  
13 Assistant United States Attorney  
Deputy Chief, Criminal Division

14 IAN V. YANNIELLO  
15 Assistant United States Attorney  
16 Deputy Chief, General Crimes  
Section

17 HAOXIAOHAN CAI  
18 Assistant United States Attorney  
General Crimes Section